

MICHAEL A. CARDOZO
Corporation Counsel of the City of New York
100 Church Street, Room 5-223
New York, New York 10007
Attorneys for the New York City
Department of Finance
Gabriela P. Cacuci, Esq.
Tel. 212-788-0688
gcacuci@law.nyc.gov

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

-----x
In re:

CIRCUIT CITY STORES, INC., et al., Chapter 11
Case No. 08-35653 (KRH)

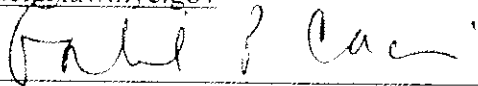
Debtors. Response Deadline: 4/7/2011, 4:00 p.m.
-----x Hearing Date: 4/14/2010 at 2 p.m.

MOTION AND ORDER FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the attached certification, the undersigned government attorney moves for admission *pro hac vice* without association with Virginia local counsel to represent The New York City Department of Finance, a governmental unit of the City of New York, solely in connection with the proof of claim filed by this governmental unit and objected to by the Liquidating Trust. Although Rule 2090-1(E)(3) makes reference only to United States or State attorneys, the undersigned is an attorney for the City of New York, a political subdivision of the State of New York, and requests an exception to the association with Virginia local counsel requirement on those grounds.

Respectfully submitted,

OFFICE OF MICHAEL A. CARDOZO
Corporation Counsel of the
City of New York
Attorney for the New York City
Department of Finance
100 Church Street, Room 5-223
New York, New York 10007
Tel. (212) 788-0688
Fax: (212) 788-0937
gcacuci@law.nyc.gov

By: 

Gabriela P. Cacuci (GC-4791)
Assistant Corporation Counsel

CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE*

Pursuant to Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia (the "Local Rules"), I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the States of New York and New Jersey, and before the United States District Courts for the Southern and Eastern Districts of New York and the District of New Jersey.

Pursuant to Rule 2090-1(C) of the Local Rules, I certify that within 90 days prior to this Application for Admission Pro Hac Vice I reread (1) the Federal Rules of Civil Procedure, the Federal Rules of Evidence, (3) the Federal Rules of Bankruptcy Procedure, and (4) the Local Bankruptcy Rules of this Court, and that I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action.

I also certify that I am a 1981 graduate of the University of Virginia Law School, have practiced law for 30 years, I am employed by the Tax & Bankruptcy Litigation Division of the

New York City Law Department and that I am generally familiar with bankruptcy practice in New York, New Jersey and other districts, having appeared to represent the interests of the City of New York and its agencies, whether in person or pro hac vice, in numerous matters both in New York and elsewhere in the United States.

No prior application for Admission Pro Hac Vice before this Court was previously made.

Dated: New York, New York
April 6, 2011

Respectfully submitted,

OFFICE OF MICHAEL A. CARDOZO
Corporation Counsel of the
City of New York
Attorney for the New York City
Department of Finance
100 Church Street, Room 5-247
New York, New York 10007
Tel. (212) 788-0688
Fax: (212) 788-0937
gcacuci@law.nyc.gov

By: 

Gabriela P. Cacuci (GC-4791)
Assistant Corporation Counsel

ORDER GRANTING MOTION

IT IS HEREBY ORDERED counsel's motion for admission *pro hac vice* is granted.

Date: _____

The Honorable Kevin R. Huennekens
United States Bankruptcy Judge